

### **REMARKS**

Applicants gratefully acknowledge the Examiner's comments during a telephone interview on June 21, 2003, including the Examiner, the below signing attorney for the Applicants and the lead inventor for the present application, Dr. Eric Saund. Of the various issues discussed, one related to the drawings which were cited as being of poor quality. Applicants believe the Examiner was addressing certain figures such as FIGURES 2A-2C, FIGURES 3A-3H, as well as potentially other FIGURES in the application. In discussing this with the Examiner, Applicants noted these drawings were intentionally presented in this manner to illustrate concepts of the present application, relating to free-hand drawing and generation of informal as well as formal structured data.

In view of the discussion with the Examiner and the explanation provided herein, Applicants respectfully request the drawing objection set forth in page 2 of the Office Action be removed.

With continuing attention to the telephone interview, Applicants note the following discussion will touch on the substance of that interview. However, it is noted that in summary, the discussion related to the various independent claims and potential amendments to those claims, as well as specific discussion as to the technology of the present application and the prior art cited in the rejection of the present claims, including Seni et al.

### **Independent Claim 1 is Now Distinguished From the Cited Art**

As discussed during the telephone interview, on page 16 of the Office Action, the rejection of claim 1 was "manifested by the conjunctive term 'or' in the independent claims." In this manner Seni et al. was believed by the Examiner an appropriate reference, as Seni et al. at least taught "text" manipulation.

Applicants have now amended independent claim 1 to specifically recite that the digital ink image has both text and line art, and have removed the conjunctive term "or" to address the Examiner's comments.

A system capable of operating with both text and line drawing is not an obvious change from Seni et al., as the ability to monitor both text and line art in one system has not been taught or fairly suggested in Seni et al. or any other cited art.

**Independent claim 3 is distinguished from the cited art.**

Applicants have amended claim 3 into independent form by including the essential limitations of previously presented independent claim 1 (which includes the conjunctive "or" language). The combination of claim 1 and claim 3 now specifically recites that as to the multiple alternative interpretations, at least two such multiple interpretations would be an informal structured object representation and a formal structured object representation.

Such concepts are not taught or fairly considered by Seni et al. or any of the other cited art.

To appreciate the concept of the alternative representations, attention is respectfully directed to FIGURES 3A-3H. As illustrated by these drawings, and as discussed in the specification, 3A may be considered an original hand sketch.

It is to be understood that a user may have several intentions of how a finalized view of the sketch may be useful for a particular implementation. Thus, FIGURES 3B-3H illustrate several equally plausible intended outputs of a user. Therefore, FIGURES 3B-3H identify the multiple structured alternative interpretations that may be achieved from the original sketch. These interpretations (formal and informal) are simultaneously maintained and may be manipulated by the user so the user may flip back and forth between the alternate representation, and may, for example, intermix an informal portion of the image with a formal portion of the image, such as for example is shown in FIGURE 3F.

Seni et al. does not teach or fairly consider any such concepts. While Seni et al. may permit conversion via a smoothing operation to obtain a more refined shape, they do not maintain both formal and informal representations simultaneously and in correspondence with one another (e.g., intermixing from various alternative interpretations, such as the ability to take a portion of a formal image and insert into a portion of an informal image) as in the present application. Thus, Seni et al. has no teaching of providing the digital ink image into "multiple alternative interpretations," where those interpretations may include informal structured object representations and structured object representations, both which are editable by the structured text/graphics editor.

For these reasons, it is respectfully submitted claim 3 is distinguished from the cited art.

**Dependent Claims 2 and 4-10 are Also Distinguished From the Cited Art**

With particular attention to claim 2, it is now specifically recited that the altering step provides for simultaneously existing, structured alternative interpretations, where each alternative interpretation is a plausible intended output of a user. , Seni et al. may develop transient alternative representations in a sequential manner as it operates its manipulation of the digital ink into a more refined shape. However, the operator cannot use any of these potential transient images for further manipulation, thus each image would not be a plausible intended output. Further, they are not configured to be simultaneously in existence, and Seni et al. does not permit the user to select a portion of one image to import it into a portion of another image, as is possible in the present application, as shown in connection with FIGURES 3A-3H, for example.

Claim 5 has been amended to more particularly define the above concepts recited in claim 2, and it is therefore submitted this claim is also distinguished for those reasons.

**Independent Claim 11 is Distinguished From the Cited Art**

For those reasons discussed in connection with claim 1, such as the elimination of the conjunctive term "or" as to the text and line art, it is submitted this claim is distinguished.

**Dependent Claims 12-13 are Distinguished From the Cited Art**

As claims 12-13 depend from claim 11, these claims are also distinguished from the cited art.

**Independent Claim 14 is Distinguished From the Cited Art**

Claim 14 recites that the structured object representations are editable by the structured text/graphics editor, thereby allowing the user to generate alternative interpretations of the digital ink image. It is now further stated that the alternative representations are presented simultaneously. Such a concept is not believed to be shown in Seni et al. This does not allow the user to pick and choose as in FIGURES 3A-3H.

**Dependent Claims 15-23 are Distinguished From the Cited Art**

As claims 15-23 depend from the distinguished independent claim 14, these

claims are also distinguished. Additionally, with particular attention to claim 16, claimed is the concept of the alternative interpretations formed, which permits for a mixing of the formal structured object representations and informal structured object representations in a single image, such as shown in FIGURE 3E. Again, none of the cited art permits the existence of the multiple alternative interpretations which permit the user to pick and choose as claimed herein.

**CONCLUSION**

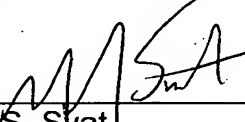
For the reasons detailed above, it is submitted all claims remaining in the application are now in condition for allowance. An early notice to that effect is therefore earnestly solicited.

In the event the Examiner considers personal contact advantageous to the disposition of this case, he/she is hereby authorized to call Mark S. Svat, at Telephone Number (216) 861-5582.

Respectfully submitted,

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